

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: TRIBUNE COMPANY  
FRAUDULENT CONVEYANCE  
LITIGATION

Consolidated Multidistrict Action

Docket No. 11-MD-2296 (RJH)

**NOTICE OF APPEARANCE**

**PLEASE TAKE NOTICE** that Milbank, Tweed, Hadley & McCloy LLP (“Milbank”) hereby appears as counsel of record for the following defendants in the following matters, and requests that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

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**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any prior or later appearance, pleading, or claim waives any defense or objection including, but not limited to, lack of jurisdiction and/or lack of or improper process and/or service of process.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance is without prejudice to any other rights, claims, actions, defenses, setoffs or recoupments under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments against any entity either in this case or in any other action, are expressly reserved.

*Deutsche Bank Trust Co. Ams. v. Blackrock Institutional Trust Co., N.A.*, Case No. 11-cv-9319 (S.D.N.Y.): RBC Capital Markets, LLC f/k/a RBC Capital Markets Corp.; Scotia Capital Inc.

*Deutsche Bank Trust Co. Ams. v. Anderson*, Case No. 11-cv-1024 (D.D.C.): RBC Capital Markets, LLC f/k/a Ferris Baker Watts, Inc.

*Deutsche Bank Trust Co. Ams. v. Ohlson Enters.*, Case No. 11-cv-3754 (N.D. Ill.): State Street Bank & Trust Company; TD Equity Options LLC f/k/a TD Options LLC

*Deutsche Bank Trust Co. Ams. v. Nat'l Elec. Benefit Fund*, Case No. 11-cv-1512 (D. Md.): National Financial Services LLC; Fidelity Management Trust Company

*Deutsche Bank Trust Co. Ams. v. Taylor*, Case No. 11-cv-10982 (D. Mass.): State Street Bank & Trust Company as Trustee of GBL Alpha Edge Common Trust FD

*Deutsche Bank Trust Co. Ams. v. Abu Dhabi Inv. Auth.*, Case No. 11-cv-4522 (S.D.N.Y.): Goldman, Sachs & Co.; Goldman Sachs Execution & Clearing, L.P.; GS Investment Strategies, LLC; Liberty Harbor Master Fund I, LP; Workers Compensation Board—Alberta

*Niese v. AllianceBernstein L.P.*, Case No. 11-cv-4538 (S.D.N.Y.): Commerz Markets LLC; Scotia Capital (USA) Inc.

*Deutsche Bank Trust Co. Ams. v. Adaly Opportunity Fund TD Secs., Inc.*, Case No. 11-cv-4784 (S.D.N.Y.): Bank of Tokyo-Mitsubishi UFJ Trust Company; Commerzbank AG; Master Trust Bank of Japan Ltd.; Mitsubishi UFJ Asset Management Ltd.; Royal Bank of Canada; Royal Trust Corporation of Canada; Goldman Sachs Execution & Clearing, L.P. f/k/a Spear Leeds & Kellogg

*Deutsche Bank Trust Co. Ams. v. Ader*, Case No. 11-cv-601 (E.D. Va.): State Street Bank & Trust Company

*Niese v. A.G. Edwards, Inc.*, Case No. 11-cv-583 (D. Del.): Goldman Sachs International Holdings LLC

*Deutsche Bank Trust Co. Ams. v. Goodrich Corp. Master Trust for Qualified Employee Benefit Plans*, Case No. 11-cv-359 (S.D. Ohio): Fidelity Management Trust Company

Dated: New York, New York  
January 27, 2012

Respectfully submitted,

/s/ Alan J. Stone

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